

Continuity of Operations Plan (COOP)

What is a COOP?

A plan that details the how essential functions of an agency will be handled during any emergency or situation that may disrupt normal operations, leaving office facilities damaged or inaccessible.

COOP Background

- “Good business practice”
- In past, COOP was an individual agency responsibility
- Changing threat environment brought need for PDD-67
- FEMA is responsible for providing guidance to agencies in developing COOP plans

COOP Objectives

- Ensuring the continuous performance of an agency's essential functions/operations during an emergency
- Protecting essential facilities, equipment, records, and other assets
- Reducing or mitigating disruptions to operations
- Reducing loss of life, minimizing damage and losses; and
- Achieving a timely and orderly recovery from an emergency and resumption of full service to customers

Planning Considerations

- Must be maintained at a high level of readiness
- Must be capable of implementation both with and without warning
- Must be operational no later than 12 hours after activation
- Must maintain sustained operations for up to 30 days
- Should take maximum advantage of existing agency field infrastructures

Elements of a Viable COOP

- Plans and Procedures
- Identification of Essential Functions
- Delegations of Authority
- Orders of Succession
- Alternate Facilities
- Interoperable Communications
- Vital Records and Databases
- Tests, Training and Exercises

Plans and Procedures

- At a minimum, the plan should:
 - Delineate essential functions and activities
 - Outline a decision process
 - Establish a roster of fully equipped and trained emergency personnel
 - Include procedures for employee advisories, alerts and COOP activation, with instructions for relocation with and without warning during duty and non-duty hours
 - Provide for attaining operational capability within 12 hours
 - Establish processes and procedures to acquire resources necessary to continue essential functions and sustain operations for up to 30 days

Identification of Essential Functions

- Determine which functions performed by the agency must be continued under all circumstances
- Prioritize essential functions
- Establish staffing and resource requirements
- Identify mission critical data and systems
- Defer functions not essential to immediate agency needs
- Integrate supporting activities

Delegations of Authority

- Identify the programs and administrative authorities needed for effective operations
- Identify circumstances under which the authorities would be exercised
- Document the necessary authorities
- State the authority of designated successors
- Indicate circumstances under which delegated authorities would become effective and when they would terminate
- Ensure that officials are properly trained
- Specify responsibilities and authorities of individual agency representatives designated to participate as members of interagency emergency response teams

Orders of Succession

- Establish orders of succession to the Agency Head position, other key headquarters leadership positions, the regional director
- Identify limitations of authority
- Describe orders of succession by positions or titles
- Include in the vital records of the agency and revise as necessary
- Establish rules and procedures
- Include the conditions under which succession will take place, method of notification, and any temporal, geographical or organizational limitations
- Assign successors among emergency teams
- Conduct orientation programs to prepare successors

Alternate Facilities

- Capable of supporting operations in a threat-free environment
- Should provide:
 - Immediate capability to perform essential functions under various threat conditions
 - Sufficient space and equipment to sustain the relocating organization
 - Interoperable communications
 - Reliable logistical support, services and infrastructure systems
 - Ability to sustain operations for up to 30 days
 - Consideration for the health, safety, and emotional well-being of employees
 - Appropriate physical security and access controls

Interoperable Communications

- Should provide:
 - Capability adequate for the agency's essential functions and activities
 - Ability to communicate with COOP contingency staff, management and other organizational components
 - Ability to communicate with other agencies and emergency personnel
 - Access to other data and systems necessary to conduct essential activities and functions

Vital Records and Databases

- Plans should account of identification and protection of vital records, systems and data management software and equipment necessary to perform essential functions and activities
- Emergency Operating Records
 - Vital records essential to the continued functioning or reconstitution of an organization during and after an emergency
- Legal and Financial Records
 - Vital records critical to carrying out an organization's essential legal and financial functions and activities and protecting the legal and financial rights of individuals directly affected by its activities
- Agencies should back up electronic files regularly

Tests, Training and Exercises

- All agencies should plan and conduct tests and training to demonstrate viability and interoperability of COOP plans
- Plans should provide for:
 - Individual and team training (annually) of agency COOP contingency staffs and emergency personnel to ensure currency of knowledge
 - Internal agency testing and exercising (annually) of COOP plans and procedures
 - Testing of alert and notification procedures and systems for any type of emergency (quarterly)
 - Refresher orientation for COOP contingency staff arriving at an alternate operating facility
 - Joint agency exercising of COOP plans

COOP Implementation

- Distinction must be made between situation requiring an evacuation only and one requiring the need to implement COOP plans
- Time phasing
 - Phase I – Activation and Relocation (0-12 hours)
 - Phase II – Alternate Facility Operations (12 hours – Termination)
 - Phase III – Reconstitution (Termination and Return to Normal Operations)

Phase 1 - Activation and Relocation (0-12 hours)

- Notify alternate facility manager(s) of possible activation and relocation requirements
- Notify FEMA Operations Center and other appropriate agencies of decision to relocate
- Activate plans, procedures and schedules
- Notify initial COOP contingency staff
- Instruct all other emergency and non-emergency personnel
- Assemble and transport needed documents and equipment and order equipment or supplies if not already in place
- Secure the normal operating facility
- Continue essential operations at the normal operating facility if available until alternate is operational
- Advise alternate operating facility manager(s) on the status of follow-on personnel

Phase II - Alternate Facility Operations (12 hours-Termination)

- Provide guidance to other key staff and non-emergency employees
- Identify replacements for missing personnel
- Begin full execution of essential operations
- Notify the FOC and other appropriate agencies immediately of the agency's alternate location, status, and duration of relocation
- Develop plans and schedules to phase down alternate facility(ies) operations

Phase III - Reconstitution (Termination and Return to Normal Operations)

- Inform all personnel that the threat or emergency no longer exists and provide instructions for returning to normal operations
- Supervise an orderly return to the normal operating facility or other temporary or permanent facility(ies)
- Report status of relocation to FOC and other agency POCs
- Conduct an after-action review of COOP operations and effectiveness of plans and procedures ASAP

FEMA's Responsibilities

- Serving as Executive Agent for Federal Executive Branch COOP
- Coordinating COOP activities of Federal Executive Branch agencies
- Issuing COOP guidance
- Chairing the COOP Working Group (CWG)
- Coordinating Federal Executive Branch interagency COOP exercises
- Conducting periodic assessments of Executive Branch COOP capabilities and reporting the results to the National Security Council

For More Information...

- FEMA Federal Preparedness Circular 65,
www.fas.org/irp/offdocs/pdd/fpc-65.htm
- Contingency Planning & Management Online, “Contingency Planning 101”,
www.contingencyplanning.com/article_index.cfm?article=162
- Your agency’s COOP plan